

GST PROGRAMME LEVEL 3: ADVANCED GST PROGRAMME Intake 2023/24

Information Package



INTRODUCTION

The Executive Tax Programme Level III (GST) is the foremost training programme in the area of Goods and Services Tax (GST) for the tax professionals in Singapore. The curriculum offers rigorous training in advanced GST concepts and relevant case laws. This programme provides a platform for the exchange of tax knowledge and views between the participants from the public and private sectors.

Participants can expect to learn from the best, as courses are conducted by senior tax professionals from the Big 4 international accounting firms, the industry and tax experts from IRAS.

STRUCTURE

There are two components to this programme, the coursework and the research/case study components. Participants will have to complete 4 modules and 1 research/case study paper over a ten-month period.

Admission Criteria

Candidates should have at least 3 years of relevant working experience in GST. They should also be graduates from a recognized university or possess relevant professional qualification (ACCA and/or CPA). Candidates must also have completed and attained at least a grade C for the GST Programme Level 2. Admission will be subject to approval by the Academy on a case-by-case basis.

The coursework modules may also be taken individually. Applications will be considered by the Academy on a case-by-case basis.

Course Fees

The course fee is S\$5,562.00. It includes 8% GST, course materials and examination fees for the first sitting.

The course fee for specific modules (i.e. for candidates not taking up the entire Advanced GST course) ranges from \$367.20 to \$1,652.40 per module (prices listed includes GST). Please refer to the course schedule for the respective module fees.

Coursework Component**GST 101 Tax Policy, Administration and Compliance**

Weightage of the module: 10%

The module is made up of 2 parts, to be covered in two 3-hour sessions. This module is tagged to the module within the Advanced Tax Programme (ATP), ATP101, of the same module title. Advanced GST participants will attend the classes with ATP participants.

Part 1 will cover the Fiscal Policy of Singapore, in particular the basic tenets of tax policy and the rationale for the policy stance. Participants will study in detail the structure of the Singapore budget using actual recent budget materials. Participants will also discuss the unique features of public finance in Singapore.

Part 2 will cover how the tax law and policies are administered in Singapore from the tax administrator's perspective. Participants will study how the tax policies formulated by the Government are actually implemented on the ground through IRAS, starting with the overall philosophy of the need to encourage voluntary compliance.

Participants will be given an appreciation of the trade-offs in tax administration in particular, the trade-off between service and compliance. The various provisions in the tax law to enable Government to enforce compliance and how IRAS goes about using these provisions to raise the level of compliance will be covered.

Assessment*:

10% of the modular assessment will be determined based on active individual classroom participation and 90% of the modular assessment will be determined based on each participant's performance on a written assignment.

GST 102 Legal Framework of Taxation

Weightage of the module: 10%

This module will be covered over one full-day and one three-hour session.

The following topics will be covered:

Appeal processes to the Board of Review and the Courts, use of case law authority of other relevant jurisdictions and case law analysis, interpretation of tax statutes in arguments and submissions before IRAS and the courts. The sessions will involve an in-depth analysis of recent tax cases and the reasoning of the court decisions in those cases. There will also be an opportunity for the class to examine and discuss interpretation of selected statutes.

Assessment*:

The module will comprise lectures, class participation and presentation, and critique. 10% of the modular assessment will be individual active classroom participation, 20% on in-class assignment and presentation and 70% on individual performance on a take-home written assignment.

GST 103 Goods and Services Tax (Law, Interpretation and Applications)

Weightage of the module: 40%

This module will be covered over four full-day and one three-hour session.

The following topics will be covered:

- (i) The direct nexus between Supply and Consideration;
- (ii) GST applications on forfeit deposits and early termination payments
- (iii) The identities of the supplier and the recipient of the supply.
- (iv) The Tests to apply in distinguishing between Single/Composite Supply (one single overall supply with more than one component) and Multiple/Mixed Supply (separate supplies with two or more components) and their GST implications
 - The leading UK case of 'Card Protection Plan Ltd'
 - How to distinguish principal and ancillary supply
- (v) International Services under Section 21(3) of the Singapore GST Act
 - What constitutes Business Establishment or Fixed Establishment
 - The meaning of 'directly in connection with' and 'directly benefit' in Zero-Rating of international services

Assessment*:

10% of the modular assessment will be determined based on active classroom participation, 10% on group discussion and presentation and 80% on individual written examination.

GST 104 GST Compliance & ACAP

Weightage of the module: 10%

This module will be covered over two half-day sessions.

The following topics will be covered:

- Why ACAP
- How to be an ACAP reviewer
- What are controls
- How to test the effectiveness of controls
- How to select samples
- How to perform substantive testing
- How to prepare ACAP report
- Practical experience of ACAP

Assessment*:

30% of the modular assessment will be determined based on active classroom participation and 70% on individual written examination.

**assessment format is correct at time of this publicity and may be subject to change.*

Research/Case Study Component

Participants can either write a research paper reviewing the policy and technical aspects of a specific topic of choice, or an advisory resolution to a scenario-based case study provided in this course. Each Participant will be guided by a mentor in either the research paper writing or case study.

Case Study

The main objective of the case study is to develop analytical and practical application skills of trainees in specialized areas/ issues.

The scope and the facts of the case are pre-developed and will be used as the single common case study for trainees who opt for this. Trainees will have to perform analysis of the case study, draw literature references from the concept and principles covered in the course notes to arrive at the appropriate recommendations. Mentor will provide guidance and advice to the trainees on the approach to the case study and their recommendations.

A sample of the case study from the last intake is found in Annex 1.

Research Paper

The research paper will be on policy and technical review. Mentor of the participant will provide guidance and advice throughout the development of the research paper.

A collated list of research topics attempted by past participants is found in Annex 1.

Requirements for the Research/Case Study Component

Submission of Research / Case Study Outline, 01 Nov 2023

The outline shall scope the coverage in the research paper and give brief descriptions on each part of the paper, for example,

- Objective of the Research / Case Study
- Issues (to list the main issues identified and their implications)
- Methodology of the Research
- Comparative Study; and
- Findings on tax principles and Relevant Case Laws.

It shall not be more than **3 pages** (Arial Font-size 14, single-line spacing) and ought to contain all the necessary details (in point form) to be covered in the final report. The outline will be circulated to all mentors and the Examining Panel. This outline is to be emailed to Tax Academy by **01 Nov 2023 (Wed), 5 p.m.**

Presentation of Outline, 16 & 17 Nov 2023 (5%)

Via Zoom

Trainees will need to present their research / case study outline to the examining panel. Trainees will be evaluated on factors listed in Annex 2. Presentation slides to be submitted via email by **08 Nov 2023 (Wed), 5 p.m.**, for examining panel reference. A schedule indicating your presentation date/time will be circulated after the start of the course.

Submission of Draft Report, 04 Mar 2024

The report shall be approximately 3,000 – 4,000 words (excluding Annexes). Please use Arial font-size 14 and single-line spacing. Word count to be reflected at the end of the report. This report is to be emailed to Tax Academy by **04 Mar 2024 (Mon), 5 p.m.**

The research/ case study is expected to cover

- Existing Legislation;
- Review of Materials on the topic;
- Comparative Analysis of legislation / position in other jurisdictions where relevant;
- Analysis of case laws;
- Application of tax principles;
- Conclusion and Recommendation.

This report will be circulated to the Examining Panel in preparation for the Report Presentation session.

Report Presentation, 14 & 15 May 2024 (5%)

Via Zoom

Trainees will be evaluated by the Examining Panel on their proficiency in handling questions posed by panel members after their presentation. Please refer to Annex 3 for the evaluation criteria. Presentation slides to be submitted 1 week before, i.e. **07 May 2024 (Tue), 5p.m.**, for examining panel reference.

Submission of Final Report, 21 Jun 2024 (20%)

The report shall be approximately 3,000 – 4,000 words (excluding Annexes). Please use Arial font-size 14 and single-line spacing.

The Final Report is to be emailed to Tax Academy by **21 Jun 2024 (Fri), 5 p.m.** Word count to be reflected at the end of the report.

Annex 4(a) lists the grading criteria for Research topic report and Annex 4(b) lists the grading criteria for Case Study.

Grading**Coursework Component:**

GST101	10%
GST102	10%
GST103	40%
GST104	10%

Research/Case Study Component:

Research/Case Study Outline Presentation	5%
Report Presentation	5%
Final Report	20%
Total	100%

In the event a participant does not pass any of the components, the following will take place,

Coursework component –

Supplementary papers will be offered to participants who do not pass any of the module(s) within 3 months upon release of module results. If participant does not pass, they will be required to re-take the module(s) with the next intake.

Research component –

Participants be allowed to improve on their report and re-submit; subject to the following,

- within a 3-month period immediately following the release of the results
- if participant fails again, they will be required to re-take the whole component with next intake

COURSEWORK SCHEDULE

Module	Mode of Delivery	Date/Time	Fee
<p>GST 101 Tax Policy, Administration and Compliance (2 sessions)</p> <ul style="list-style-type: none"> - Fiscal Policy of Singapore - Formulation and Implementation of tax policies - Enforcement of Tax Compliance <p>Module Weightage: 10% Assessment: Graded take-home assignment</p>	Zoom	<p>01 Aug 2023 (Tue) 6.30 p.m. – 9.30 p.m.</p> <p>04 Aug 2023 (Fri) 6.30 p.m. – 9.30 p.m.</p>	\$367.20
<p>GST 102 Legal Framework of Taxation (3 sessions)</p> <ul style="list-style-type: none"> - Appeal Processes - Case law authorities and Analysis - Interpretation of Tax Statutes in submissions - Recent GST/VAT cases <p>Module Weightage: 10% Assessment: Graded take-home assignment</p>	Zoom	<p>17 Aug 2023 (Thu) 6.30 p.m. – 9.30 p.m.</p> <p>24 Aug 2023 (Thu) 6.30 p.m. – 9.30 p.m.</p> <p>31 Aug 2023 (Thu) 6.30 p.m. – 9.30 p.m.</p>	\$550.80
<p>GST 103 Goods and Services Tax (Law, Interpretation and Applications) (9 sessions)</p> <p>Advanced Concept of Supply & Consideration</p> <ul style="list-style-type: none"> - Importance of ‘Direct Link’ between payment and supply made - Tests of Single / Multiple Supply - Taxability of Deposits and Early Termination Payments <p>Concept of Business Establishment and Fixed Establishment</p> <p>International Services</p> <ul style="list-style-type: none"> - Place of Supply of Services - Zero-rated Services - Meaning of ‘Directly In Connection With’ Goods or Property - Meaning of ‘Directly Benefit’ - Identifying the Establishment Receiving the Supply of Service <p>Module Weightage: 40% Assessment: Exam</p>	In-person	<p>18 Sep 2023 (Mon) 9 a.m. – 5 p.m.</p> <p>19 Sep 2023 (Tue) 9 a.m. – 5 p.m.</p> <p>25 Sep 2023 (Mon) 9 a.m. – 5 p.m.</p> <p>26 Sep 2023 (Tue) 9 a.m. – 5 p.m.</p> <p>27 Sep 2023 (Wed) 9 a.m. – 12 p.m.</p>	\$1,652.40
	Exam: 04 Oct 2023 (Wed) 10 a.m. – 12 p.m.		

<p>GST104 GST Compliance & ACAP (2 sessions)</p> <ul style="list-style-type: none"> - Background – the need for ACAP and the benefits - How to conduct ACAP, post ACAP review (“PAR”) and ACAP renewal - What are the controls - How to test the effectiveness of controls - How to conduct substantive testing - How ACAP status is accorded - How to monitor and maintain ACAP including linking this to PAR and ACAP renewal - Special circumstances after the accordance of ACAP e.g. merger and acquisition 	<p>In-person</p>	<p>05 Sep 2023 (Tue) 9 a.m. – 5 p.m.</p>	<p>\$367.20</p>
<p>Module Weightage: 10% Assessment: Exam</p>		<p>Exam: 15 Sep 2023 (Fri) 10 a.m. – 12 p.m.</p>	

RESEARCH/CASE STUDY SCHEDULE

[FEE: \$2,700.00 (inclusive of GST)]

Item	Date	Time
Release of Case Study via email	25 Sep 2023 (Mon)	-
Submission of Research/Case Study Selection (topic/selection can be changed after mentor consultation)	16 Oct 2023 (Mon)	Email submission by 5 p.m.
Submission of Research/ Case Study Outline	01 Nov 2023 (Wed)	Email submission by 5 p.m.
Presentation of Outline (5%) <i>via Zoom</i> <i>*presentation slides to be submitted via email on 08 Nov 2023 (Wed), for examining panel reference</i>	16 Nov 2023 (Thu) 17 Nov 2023 (Fri)	9 a.m. – 6 p.m. Individual presentation schedule to be advised.
Submission of Draft Report	04 Mar 2024 (Mon)	Email submission by 5 p.m.
Presentation of Report (5%) <i>via Zoom</i> <i>*presentation slides to be submitted 1 week before, i.e. 07 May 2024 (Tue), for examining panel reference</i>	14 May 2024 (Tue) 15 May 2024 (Wed)	9 a.m. – 6 p.m. Individual presentation schedule to be advised.
Submission of Final Report (20%)	21 Jun 2024 (Fri)	Email submission by 5 p.m.
Release of Results	Aug 2024	-

**Dates indicated in both tables are accurate at time of printing and may be subject to changes.*

ANNEX 1

- Case Study from last intake: *(refer to separately attached file)*
- List of past research topics:

	<u>Topic</u>
1	The Distinguishing Factors for Lease (as goods) and Facilities (as services) and its Significance for GST Purposes
2	The GST Implications on Beneficiary Interest in land
3	Partial Exemption and Input Tax Recovery – Review of Regulation 29(3) and Reg 35
4	A Review of the GST treatment of Transfer of Partnership Interest
5	Interpretation and Application of Paragraph 5(3) of the Second Schedule to the GST Act on the Use of Business Premises by a Third Party for Free
6	Whether the Permanent Establishment and Tax Residency for Income Tax purposes are Relevant for Determining Business or Fixed Establishment for GST purposes
7	A study on the Significance of regarding a Treatment or Process of Goods as a Supply of Goods for GST Purposes
8	Taxability of Rebates
9	Reverse Charge – GST on Imported Services
10	A study on GST rules applicable to cloud computing
11	A study on the GST implications of funds raised through crowdfunding activities
12	GST on Early Terminations, Forfeited Deposits and Liquidated Damages
13	GST Taxability of Payments on Cancellation, Termination, Compensation and Settlement
14	A Review of Regulations 37 and 39 in the Context of Capital Assets
15	Review on the GST treatment of Termination Fees

ANNEX 2 : Presentation of Research/Case Study Outline

(30 mins per participant including Q & A)

* Presentation: 15mins / Comments by examining panel: 15mins

Trainee will be evaluated on (5 marks):

1. Has the research/case study been substantially scoped?
2. Have the issues under the topic been clearly identified?
3. Will the research methodology be able to conclude useful findings on the topic? (if applicable)
4. Comparative Study - Whether the study is relevant to the issue identified for research/case study?
5. Are Tax Principles & Case Laws identified relevant to the topic?

ANNEX 3: Report Presentation

(60 mins per participant including Q & A)

* Presentation: 40mins / Comments by examining panel: 20mins

Trainee will be evaluated on:

A. Presentation of research topic/ case study (5 marks)

1. Presentation must highlight key issues and new insights and recommendations.

B. Handling of questions posed by panel members (5 marks)

1. Able to answer coherently.
2. Able to answer confidently.
3. Able to explain clearly.

ANNEX 4(a): Final Report grading criteria for Research Topic

The report shall be approximately 3,000 – 4,000 words (excluding Annexes). Please use Arial font-size 14 and single-line spacing.

A. Executive Summary (2 marks)

1. Objectives clearly stated
2. Findings are summarised.
3. Research methodology stated (if applicable)
4. Conclusion highlighted

B. Body of the report (19 marks)

1. Issues from various aspects clearly identified. (2 marks)
2. Analysis of background and current practices. (3 marks)
3. Logical development of argument. (3 marks)
4. Technical and legal analysis, including application of concepts learnt in *coursework component and technical basis of proposed advisory. (6 marks)
5. Ability to use and cite authority (where applicable - legislation, case law, published articles, etc.) to support argument. (5 marks)

C. Conclusion and Recommendation (9 marks)

1. Conclusion incorporates own insights and reasoning. (3 marks)
2. Recommendations. (3 marks)
3. Adequately address issues and remarks raised by Examining Panel during Report Presentation. (3 marks)

**coursework component comprises: GST101 Tax Policy, Administration & Compliance; GST102 Legal Framework of Taxation, GST103 Goods & Services Tax (Law, Interpretation and Applications) & GST104 GST Compliance & ACAP*

ANNEX 4(b): Final Report grading criteria for Case Study

The report shall be approximately 3,000 – 4,000 words (excluding Annexes). Please use Arial font-size 14 and single-line spacing.

A. Body of the report (21 marks)

1. Issues from various aspects clearly identified and addressed. (4 marks)
2. Logical development of argument. (3 marks)
3. Technical and legal analysis, including application of concepts learnt in *coursework component, current practices and technical basis of proposed advisory. (8 marks)
4. Ability to use and cite authority (where applicable - legislation, case law, guidance by Comptroller, published articles, etc.) to develop advisory. (6 marks)

B. Conclusion and Recommendation (9 marks)

1. Conclusion incorporates own insights and reasoning. (3 marks)
2. Recommendations. (3 marks)
3. Adequately address issues and remarks by Examining Panel during Report Presentation. (3 marks)

**coursework component comprises: GST101 Tax Policy, Administration & Compliance; GST102 Legal Framework of Taxation, GST103 Goods & Services Tax (Law, Interpretation and Applications) & GST104 GST Compliance & ACAP*